

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
DIVISION OF JUDGES**

**LION ELASTOMERS**

**and**

**Case No:16-CA-190681  
16-CA-203509  
16-CA-225153**

**UNITED STEEL, PAPER AND FORESTRY,  
RUBBER, MANUFACTURING, ENERGY,  
ALLIED INDUSTRIAL AND SERVICE  
WORKERS INTERNATIONAL UNION, LOCAL 228**

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**RESPONDENT'S MOTION TO CORRECT TRANSCRIPT**

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Comes now the Respondent, Lion Elastomers, by its undersigned counsel, and files its Motion to Correct Transcript regarding the transcript for the hearing conducted in Houston, Texas on February 26-27, 2019. In support of its Motion, Respondent identifies the following needed corrections:

<b><u>PAGE(S)</u></b>	<b><u>LINE(S)</u></b>	<b><u>FROM</u></b>	<b><u>TO</u></b>
43	6	file	Filed
47	7	mischaracterizing	mischaracterizes
52	16	a	Ø
102	12	wont'	won't
103	1	full.	full.”
129	6	say	saying
151	20	actual	actually
153	12	understand	understanding
153	12	Moseley	Mosley
153	14	proper	improper

216	4	Milo	Ronald
220	12	calls	caused
228	20	Wisenberger	Wisenbaker
230	7-8	at a four	at an (a)(4)
230	9	JUDGE ROSAS	MR. CUPP
230	21	MR. CUPP	JUDGE ROSAS
230	23	JUDGE ROSAS	MR. CUPP
230	25	MR. CUPP	JUDGE ROSAS
231	1	JUDGE ROSAS	MR. CUPP
231	3	MR. CUPP	JUDGE ROSAS
231	4	JUDGE ROSAS	MR. CUPP
231	13	MR. CUPP	JUDGE ROSAS
231	14	JUDGE ROSAS	MR. CUPP
231	20	MR. CUPP	JUDGE ROSAS
231	22	JUDGE ROSAS	MR. CUPP
231	24	MS. SHAPIRO	MS. WRIGLEY
231	25	MR. CUPP	JUDGE ROSAS
232	2	JUDGE ROSAS	MR. CUPP
232	4	MR. CUPP	JUDGE ROSAS
232	6	JUDGE ROSAS	MR. CUPP
232	9	MR. CUPP	JUDGE ROSAS
232	10	JUDGE ROSAS	MR. CUPP
232	11	MR. CUPP	JUDGE ROSAS
232	12	JUDGE ROSAS	MR. CUPP
232	13	MR. CUPP	JUDGE ROSAS
232	15	JUDGE ROSAS	MR. CUPP

232	16	MR. CUPP	JUDGE ROSAS
232	17	JUDGE ROSAS	MR. CUPP
232	22	MR. CUPP	JUDGE ROSAS
232	23	JUDGE ROSAS	MR. CUPP
233	3	MR. CUPP	JUDGE ROSAS
233	7	JUDGE ROSAS	MR. DOOLEY
233	11	MR. CUPP	JUDGE ROSAS
233	13	JUDGE ROSAS	MR. DOOLEY
233	16	MR. CUPP	JUDGE ROSAS
233	20	JUDGE ROSAS	MR. CUPP
233	25	MR. CUPP	JUDGE ROSAS
234	2	JUDGE ROSAS	MR. CUPP
234	9	Ø	JUDGE ROSAS
236	7	MR. DOOLEY	MR. CUPP
240	9	there's	is
240	13	MT.	MR.
242	11	Ø	BY JUDGE ROSAS:
244	5	>	.
245	7	Niches	Neches
249	5	The Union	“The Union”
251	8	John	I
252	25	Mosley	Colone
257	22	wever	ever
260	11	MR. DOOLEY	MR. CUPP
265	16	grievants	grievance
265	21	grievants	grievance

267	3	JUDGE ROSAS	MR. CUPP
267	5	MR. CUPP	MR. DOOLEY
269	20	ministering	administering
270	11	Wise baker	Wisenbaker
270	24	tack	attack
271	6-7	the aspective	that perspective
272	5	contacts	contents
272	16	site	cite
278	1	grievant	grievance
278	17	thye	they
281	7	RASOS	ROSAS
283	15	statute	steps
284	25	grabbering	corroborating
285	23	full	will
287	10	IT	It
290	5	fee	Ø
292	18	kit	kid
296	7	Who hethere	There
296	8	next was referring to	names he was referring to
301	7	Mr. Clem	Mr. Colone
302	17	Mr. Clem	Mr. Colone
302	24	Mr. Clem	Mr. Colone
302	25	Mr. Clem	Mr. Colone
306	23	Mr. Clem	Mr. Colone
307	23	MR. DOOLEY	MR. CUPP
310	18	Fort Naches	Port Neches

311	18	grievant	grievance
315	11	Count Solen	counsel
316	4	Mr. Clem	Mr. Colone
316	7	Mr. Clem	Mr. Colone
319	2	JDUGE	JUDGE
331	17	Jams	James
335	21	MS. WRIGLEY	MS. SHAPIRO
335	23	MS. WRIGLEY	MS. SHAPIRO
336	22	MS. WRIGLEY	MS. SHAPIRO
336	24	MS. WRIGLEY	MS. SHAPIRO
337	4	MS. SHAPIRO	MS. WRIGLEY
337	8	MS. WRIGLEY	MS. SHAPIRO
337	10	MS. WRIGLEY	MS. SHAPIRO
337	15	MS. WRIGLEY	MS. SHAPIRO
337	19	MS. WRIGLEY	MS. SHAPIRO
337	21	MS. SHAPIRO	MS. WRIGLEY
337	24	MS. SHAPIRO	MS. WRIGLEY
338	11	Mr. Calone	Mr. Colone
338	11	Mr. Barton	Mr. Burton
338	12	MS. ROSAS	MS. LORD
338	13	MS. SHAPIRO	MS. WRIGLEY
339	1	Briggs'	Griggs'
339	3	Briggs	Griggs
339	3 (further down)	Briggs	Griggs
339	11-12	without providing me it, sir	unknown
339	23	Briggs	Griggs

341	5	Jacqueline	Jaklyn
342	23	Rose	Those
344	18	Fort Naches	Port Neches
349	11	So you and Lucy	unknown
349	24	Casey	K.C.
352	3	time form	tank farm
352	6	time forms	tank farms
354	15	Tommy	Tony
354	23	+4began	began
356	1	Tribe	Scribe
356	18-19	and the case in mind	and in K.C.'s mind
357	24	functional	dysfunctional
358	18	arm	Unknown
358	21	Moses	Mosley
359	1	Ms. Domozi	Mr. Mosley
359	3	let	leave
360	20	blind	blend
360	22	leaving town	tank farm
363	21	Ford	Lord
364	4	men	me and
365	14	claim	plant
366	4	companies	the company
368	11	Mr. Bridges	Mr. Griggs
368	11	will file the question	Unknown
368	16	Mr. Loren	Ms. Lord
369	14	JUDGE ROSAS	MR. CUPP

375	13	Colones	Colone's
375	23	Mr. Malone	Mr. Colone
392	14	Jonathon	Jonathan
397	15	Jonathon	Jonathan
398	9	Mosely	Mosley
401	16	issuance	insurance
409	16	did	did not
472	23	if	of it
480	12	much temperature	much higher temperature

On pages 262 and 263 of the transcript (for February 27, 2019), lines four through eight (page 263) are duplicative of lines 22 (page 262) through 1 (page 263). The former should be stricken.

On page 290 of the transcript (for February 27, 2019), there should be a line break on line 20, beginning with "but." This is the start of a question by Ms. Wrigley, which continues through line 22.

On lines 10 through 11 of page 338 of the transcript (for February 27, 2019), a question by Ms. Wrigley is incorrectly attributed to Ms. Lord as an answer.

On page 350 of the transcript (for February 27, 2019), after line 9, there should be a statement by Mr. Dooley denying the existence of any Jencks materials for Mr. McCray.

Finally, page 209 of the transcript (for February 27, 2019) indicates that Respondent's Exhibit 5 was marked for identification but never entered into evidence. On page 406 of the transcript (for February 27, 2019), Respondent's Exhibit 5 is received into evidence.

THIS the 23rd day of April, 2019.

Respectfully submitted,

s/Jaklyn Wrigley

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Jaklyn Wrigley, Esq.

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ATTORNEYS FOR RESPONDENT



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**CERTIFICATE OF SERVICE**

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I hereby certify that on April 23, 2019, I e-filed the foregoing using the Board's e-filing system and immediately thereafter served it by electronic mail upon the following:

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Bryan Dooley  
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s/Jaklyn Wrigley  
JAKLYN WRIGLEY